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Subject: Summary of Field Observations
Pre-Scoping Site Visit 24 July 1989
American Crossarm and Conduit Company
Chehalis, Washington
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Dear Lee:

This letter contains a summary of Roy F. Weston's (WESTON) field observations during a pre-scoping site visit. Included are observations made by Frank Monahan and Steve Fuller of WESTON's Seattle office. This letter was prepared as documentation of our site visit with you on 24 July 1989.

OBSERVATIONS

As you will recall, after our informal introduction to Mr. Jack Ross (Owner of Freeway Auto Parts and current lessee), we proceeded to walk through the facility, progressing from the north to the south, and then proceeded to the stormwater discharge lagoon west of the property. WESTON's observations are presented in the order observed.

Wood Treatment Area

The former wood treatment area is enclosed by a 7-foot locked chain-link security fence. The area enclosed is flat and largely covered with asphalt, concrete, or structures. Enclosed in this area is an office, control building, retorts, sumps, drains, former surface impoundment, and ash from the incineration of PCP-contaminated waste.

The office contains bottled laboratory chemicals, laboratory glassware, old files, and a sink. The discharge point for the sink drain is not known.

The control room for the treating process is in disrepair; oils (probably containing PCP) are present on valves piping, floor, and in floor sumps associated with discolored water. Undeveloped

exposed film is present in drawers. Sumps in the retort area contain discolored water, solid material, and oil films. Below-grade steam pipe conduits contain discolored soil materials associated with steam pipes and insulating wrap.

The western portion of the wood treating area slopes down to the base of the railroad grade and is not surfaced. A ditch is present adjacent to the railroad grade that flows to the south under the kilns and mill and eventually past the disposal area to Dillenbaugh Creek. There is an open excavation (30 x 30 feet) approximately 3 feet deep in the western portion of the area that contained about 6 inches of standing water on sheet plastic. The standing water is discolored and exhibits floating oil globules. The excavation is the result of cleanup actions. A stormwater catch basin inside the fence receives rain water runoff, which is directed to a city stormwater sewer.

There is potential for dermal contact with oils and wood treating chemical in this area, as well as the potential for injury from falling, puncture, or exposure to chemicals to intruders who scale the fence. The fence is, however, a reasonably well constructed barrier to entry.

Access to the kilns, mill, and disposal area is only partially restricted from Chehalis Avenue. These areas can be accessed from the west and south fairly easily. The following paragraphs describe these three areas.

Kilns

Access to kilns is not restricted. Kills are constructed on a pile-supported platform. Openings are present in the elevated wood platform allowing direct access to the ground surface 10 feet below. Kilns partially destroyed by fire appear less than structurally sound. Pipe rap that potentially contains asbestos is present. The fibrous materials are exposed to the atmosphere. Whether lead was used in the mortar for the brick-lined kilns is not known. An elevated crane way trestle parallels the kilns and mill on the west edge of the facility. The ditch described earlier flows under the crane way.

Mill

The mill is also constructed on a pile-supported foundation. The mill is three-story timber-and-beam frame construction and appears

structurally intact. The structural integrity was not evaluated. PCB-containing electrical equipment is labeled as containing PCBs. Six small transformer/capacitors were reported to exist; three were observed. Machining oils have stained the wood floor boards below milling equipment stations.

The ground surface below the pile-supported elevated kilns and mill was observed to be wet and swampy. The surface soil appeared to be silt (muck) covered with driftwood, timbers, and assorted flood-borne flotsam and refuse. Ponded water was observed in a few locations. Access to these soils and the under structure will require an individual to climb under the somewhat dilapidated structure. This low area received runoff from the wood treating area.

Disposal Area (Landfill)

The physical condition of the disposal area is fairly innocuous. The surface of the fill in the disposal area is about 10 to 12 feet above the former ground surface elevation next to the mill and slopes gently to the south. Isolated concrete rubble is exposed through granular fill cover material. The surface is firm with little indication of settlement. No odors were noticed. Used lumber, rusting structural steel members, piping, steel tanks, assorted industrial refuse, and wrecked autos and salvaged automotive parts were present on the surface of the disposal area near the mill. The ground surface in the vicinity of the wrecks and parts had isolated stains from fluids emanating from the parts. There may be contaminants in the surface soils, but physical or chemical hazards at the disposal area are not readily apparent. These constituents may come into play if it were excavated or remobilized by a flood.

Stormwater Discharge Lagoon

Access to the stormwater discharge lagoon was provided by crossing the railroad tracks and walking across a wood waste disposal area west of the facility. The wood waste fill is spongy and may provide access limitations to conventional drill equipment. The lagoon was only partially visible due to thick undergrowth. The outlet for the storm drain was not observed. No real barriers are present that prevent access to the lagoon.

SUMMARY

Additional restrictions in casual access to the kilns and mill are warranted from a physical hazards standpoint. The "free sawdust" sign should be removed as it serves as an invitation to access. Complete restriction may not be warranted or practicable. As a minimum, new fencing with locking gates is recommended along Chehalis Avenue to limit casual access. The southern part of the property is remotely accessible by crossing wetlands. The western portion of the property is accessed by crossing railroad tracks. Both of these routes of access are not casual approaches.

The physical structures on the facility impose severe limitations on access for sampling soil or groundwater beneath the kilns and mill. Some consideration should be given to demolition of buildings and structures prior to soil and groundwater characterization activities.

The release of automotive fluids on the facility from recent Freeway Auto Parts activities will have to be addressed in characterization work plan development efforts. This constitutes an incompatible on-site activity that should be eliminated. Additional access limitations may be recommended after completion of the baseline risk assessment.

Respectfully,

Steve R. Fuller, RG
Site Manager

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